probable cause to believe that the Defendant committed the following offense(s):

COUNT 1

On or about the 11th day of January, 2010 to the 23rd day of March, 2010, in Ramsey County, Minnesota, the defendant, **TERRENCE ARTHUR PRICE**, aiding and abetting and being aided and abetted by another, did unlawfully with intent to defraud for the purpose of depriving another of property or for pecuniary gain, cause to be presented information containing a false representation as to any material fact or conceals a material fact concerning a claim under an insurance policy for payment or benefit of more than \$5,000.

Said acts constituting the offense of **Insurance Fraud** in violation of MN Statute: §609.611.1(a); 609.611.3; 609.52.3(2); 609.05.1

Maximum Sentence: 10 years or \$20,000 fine, or both.

COUNT 2

On or about the 11th day of January, 2010 to the 23rd day of March, 2010, in Ramsey County, Minnesota, the defendant, **TERRENCE ARTHUR PRICE**, aiding and abetting and being aided and abetted by another, did unlawfully obtain for the defendant or another the possession, custody, or title to property of or performance of services by another person of a value more than \$5,000 by intentionally deceiving the victim with a false

Terrence Arthur Price Co. Atty. Complaint No.: 2117028-2 Court File No.:



representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it is made.

Said acts constituting the offense of **Theft by False Representation** in violation of MN Statute: §609.52.2(3); 609.52.3(2); 609.05.1

Maximum Sentence: 10 years or \$20,000 fine, or both.

COUNT 3

On or about the 23rd day of March, 2010, in Ramsey County, Minnesota, the defendant, **TERRENCE ARTHUR PRICE**, did unlawfully knowing or having reason to know the property was stolen, receive, possess, buy, transfer or conceal stolen property of a value more than \$5,000.

Said acts constituting the offense of **Receiving Stolen Property** in violation of MN Statute: §609.53.1; 609.52.3(2)

Maximum Sentence: 10 years or \$20,000 fine, or both.



STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your complainant is a sworn peace officer and detective with the Minnesota Department of Commerce – Division of Insurance Fraud Prevention and bases this complaint on the investigation performed by American Family Life Assurance Company (Aflac), bank records, witness statements and his own investigation:

In May of 2011, Aflac began investigating a number of insurance claims in Minnesota that closely resembled fraudulent claims filed by insurance fraud rings in other parts of the United States. Two such claims had purportedly been filed by **TERRANCE ARTHUR PRICE** (**D.O.B. 7/10/1975**) and his mother, **BURNELL FRANKLIN** (**D.O.B. 12/25/1946**). Aflac had sent checks for approximately \$10,000 to each defendant after receiving claims that they had sustained burns during household accidents that were so serious as to require hospitalization. The medical records submitted with these insurance claims had been completely fabricated, and the treating physician listed on the medical records had not seen either defendant for treatment.

On January 11, 2010, PRICE applied for an Accidental Death and Dismemberment (AD&D) policy with Aflac at a location in St. Paul, Ramsey County. Someone filed a claim against the policy on PRICE's behalf on March 14, 2010. The claim indicated that PRICE injured himself while lighting the pilot light on a water heater, setting his clothes on fire. The claim also indicated that PRICE had to be hospitalized at Mercy Hospital in Coon Rapids, MN from March 10, 2010 to March 13, 2010.

Attached to the claim form were what purported to be medical records from Mercy Hospital. These records indicated that PRICE's treating physician was A.M.F. and that PRICE had sustained third degree burns covering 176 square centimeters on his torso and an 18 inch laceration on his leg that required 20 sutures to close.

As a result of these claims, Aflac sent a check for \$10,520 to PRICE's St. Paul address on March 18, 2010. PRICE then cashed the check on March 23, 2010 at a TCF Bank in Maplewood, Ramsey County.

On March 22, 2010, FRANKLIN applied for an AD&D policy with Aflac at a location in St. Paul. Someone filed a claim against the policy on FRANKLIN's behalf on April 30, 2010. The claim indicated that FRANKLIN injured herself while cooking at her St. Paul home. The claim also indicated that FRANKLIN had to be hospitalized at Mercy Hospital in Coon Rapids, MN from April 27, 2010 to April 30, 2010.

Attached to the claim form were what purported to be medical records from Mercy Hospital. Like PRICE's records, these indicated that A.M.F. was the treating physician and that FRANKLIN had sustained third degree burns covering 250 square centimeters of her body, requiring skin grafts.

As a result of these claims, Aflace sent a check for \$9,920 to FRANKLIN's St. Paul address on May 6, 2010. FRANKLIN cashed the check at a TCF Bank in Maplewood, Ramsey County on May 11, 2010.

This investigator contacted A.M.F., a doctor at Mercy Hospital, and questioned him about these claims. After reviewing the medical records submitted on behalf of PRICE and FRANKLIN, A.M.F. stated that these were not records from Mercy Hospital, the signature on the records was not his and that neither defendant had been a patient of his during the claimed time periods.

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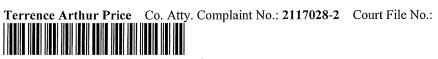
This investigator also spoke with both PRICE and FRANKLIN during the course of this investigation. On June 29, 2012, this investigator spoke with PRICE at the Rush City Correctional Facility in Rush City, MN. PRICE waived his Miranda rights and agreed to answer questions. PRICE said that he had talked to a woman named Dannisha at a birthday party in July 2009. Dannisha had driven to the party in a nice van and had told PRICE that all he had to do to get some money was to apply for an insurance policy, pay the premium for a few months and that he would then get a check in the mail.

PRICE admitted to applying for the insurance policy with Aflac and paying the premium for a few months, but he said that he did not send in the insurance claim or false hospital records. A comparison of PRICE's signature on the application form and the claim form appear to be different. PRICE also admitted that he had no burn injuries to his torso or laceration to his leg. PRICE admitted getting a check for \$10,520 from Aflac and cashing it. After cashing the check, PRICE kept \$5,000 and gave the rest to his mother, FRANKLIN, who was going to meet another person who helped set up this insurance scheme.

On June 29, 2012, this investigator spoke with FRANKLIN at her residence in St. Paul. FRANKLIN stated that PRICE had called her after making a statement to this investigator, so she knew about the investigation. FRANKLIN agreed to discuss the matter and confirmed much of what PRICE had earlier admitted to. FRANKLIN knew that a woman named Dannisha had approached PRICE about making some money and decided to try it herself. FRANKLIN said that the arrangement consisted of taking out an insurance policy and then waiting for someone else to put in a claim.

FRANKLIN admitted to applying for the insurance policy with Aflac and identified her signature, but she stated that she did not send in the insurance claim or false hospital records. When asked how the arrangement worked, FRANKLIN admitted that someone else submitted the false claim and that FRANKLIN was to forward a percentage of the insurance payout to the person who submitted the false claim. In this instance, FRANKLIN stated that she forwarded between \$5,000 and \$6,000 to the other person and kept the rest for herself. FRANKLIN also admitted to meeting with this other person and delivering a portion of the money that her son, PRICE, had obtained by participating in the same scheme.

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Complainant requests that Defendant, subject to bail or conditions of release, be: (1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or (2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.				
COMPLAINANT'S NAME:	COMPLAINANT'S SIGNATURE:			
John Billington				
Subscribed and sworn to before the undersigned	this day of, 20			
NAME/TITLE:	SIGNATURE:			

Being authorized to prosecute the offenses charged, I approve this complaint.

Date: 11/27/2012

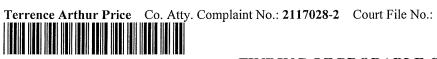
PROSECUTING ATTORNEY'S SIGNATURE:

Name: John Ristad Assistant Ramsey County Attorney 50 West Kellogg Blvd, #315 St. Paul, MN 55102

651-266-3222/jh

Attorney Registration #387580

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FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense.

	SU	MMONS	
THEREFORE YOU, THE ABOVE-NAME	ED DEFENDANT, AR	E HEREBY SUMMONED to appear on the day of	
, 20 at before the	ne above-named court	at	_ to
answer this complaint. IF YOU FAIL TO APPEAR in response to	this SUMMONS, a W	ARRANT FOR YOUR ARREST shall be issued.	
		ARRANT	
of Minnesota, that the above-named Defend named court (if in session), and if not, before	or other person authori lant be apprehended an re a Judge or Judicial (Nationwide Execute in Border States zed to execute this warrant: I hereby order, in the name of the darrested without delay and brought promptly before the all officer of such court without unnecessary delay, and in any exicial Officer is available to be dealt with according to law.	oove-
Since the above-named Defendant is alread Defendant continue to be detained pending	y in custody, I hereby	F DETENTION order, subject to bail or conditions of release, that the above-	-named
Bail: \$30,000.00 Conditions of Release:			
This complaint, duly subscribed and sworn 20	to, is issued by the und	lersigned Judicial Officer this day of	_
JUDICIAL OFFICER: NAME: TITLE:		SIGNATURE:	
Sworn testimony has been given before the	Judicial Officer by the	following witnesses:	
COUNT	ΓY OF RAMSEY	Clerk's Signature or File Stamp:	
STATE C	OF MINNESOTA		
STATE OF MINNESOTA	Plaintiff,	RETURN OF SERVICE I hereby Certify and Return that I have served a copy of the	:
VS.		I nereby Cernfy and keturn that I have served a copy of thi COMPLAINT upon the Defendant herein named.	s
TERRENCE ARTHUR PRICE	Defendant.	Signature of Authorized Service Agent:	

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FINDINGS OF FACT

Probable cause found that defendant committed the offenses charged.

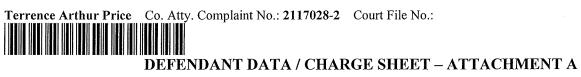
Ordered defendant's motion to dismiss denied.

Plea of not guilty to all counts entered.

Trial and hearing on all issues set.

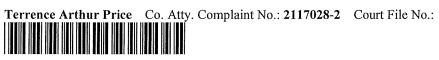
Dated:	
	JUDGE OF DISTRICT COURT

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DEFENDANT NAME:	TERRENCE ARTHUR PRICE	DOB: 07/10)/1975
Defendant alias name(s):	Terrance Arthur Price	Alias DOB(s):	10/07/1975
	Alphus Lamont Price		11/25/1969
Defendant last known address:	1174 4th Street East #303 St. Paul, MN 55106		
State ID: Fingerprint ID: FBI ID: St. Paul PD ID: Offender ID:	MN94004608 165235 644735VA7		
OTHER DEFENDANT	/ CASE IDENTIFIERS:		

OTHER DEFEN	NDANT / CASE IDEN	TIFIERS:		
Fingerprinted?	☐ No	Yes		
Handgun permit?	☐ No	Yes (Issuing Agency:)	
Location of violation	1:			
IF DRIVING OFFI	ENSE:			
Driver's License	Number:		Issuing State:	
License Plate	Number:		Issuing State:	
Accident Type:	No injury/no damage	e	Property Damage	
check all that apply	Personal Injury		Fatality	
Blood Alcohol Conc	entration (BAC):			ļ



FELONY WARRANT COMPLAINT

CT NO	OFFENSE DATE	STATUTE TYPE	STATUTE NBR	STATUTE DESCRIPTION	OFFENSE LEVEL	MOC	G O C	AGENCY ORI CN NBR FUNCTION
1	01/11/2010 to 03/23/2010	Definition	609.52.3(2)	Insurance Fraud-Present False Representation/Conceals Facts Ins Fraud-Sentence Theft-Value over \$5,000 or Trade Secret, Explosive, Controlled Substance I or II Liability for Crimes of Another-Intentional	F	U168G		MN Dept. of Commerce - Insurance Fraud ORI - MN062095Y CN - 11000594 Charging
2	01/11/2010 to 03/23/2010		609.52.2(3) 609.52.3(2) 609.05.1	Theft-False Representation Theft-Value over \$5,000 or Trade Secret, Explosive, Controlled Substance I or II Liability for Crimes of Another-Intentional	F	U105G		MN Dept. of Commerce - Insurance Fraud ORI - MN062095Y CN - 11000594 Charging
3	03/23/2010	Charge Penalty	609.53.1 609.52.3(2)	Receiving Stolen Property Theft-Value over \$5,000 or Trade Secret, Explosive, Controlled Substance I or II	F	Q119C		MN Dept. of Commerce - Insurance Fraud ORI - MN062095Y CN - 11000594 Charging